MORVILLO ABRAMOWITZ GRAND IASON & ANELLO P.C.

ELKAN ABRAMOWITZ
RICHARD F. ALBERT
ROBERT J. ANELLO*
BENJAMIN S. FISCHER
CATHERINE M. FOTI
CHRISTOPHER B. HARWOOD
LAWRENCE IASON
BRIAN A. JACOBS
TELEMACHUS P. KASULIS
JODI MISHER PEIKIN
ROBERT M. RADICK*
JONATHAN S. SACK**
EDWARD M. SPIRO
JEREMY H. TEMKIN
RICHARD D. WEINBERG

565 FIFTH AVENUE NEW YORK, NEW YORK 10017 (212) 856-9600 FAX: (212) 856-9494

www.maglaw.com

WRITER'S CONTACT INFORMATION

ranello@maglaw.com 212-880-9520

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SENIOR COUNSEL
PAUL R. GRAND
COUNSEL
JASMINE JUTEAU
CURTIS B. LEITNER
JACOB W. MERMELSTEIN
BRENT M. TUNIS

ROBERT G. MORVILLO 1938-2011 MICHAEL C. SLBERBERG 1940-2002 JOHN J. TIGUE. JR. 1939-2009

*ALSO ADMITTED IN WASHINGTON D.C.

BY ECF

The Honorable Lorna G. Schofield Thurgood Marshall United States Courthouse 40 Foley Square, Room 1106 New York, NY 10007

Re: SEC v. Bajic, et al., 20-cv-00007-LGS-KHP

Dear Judge Schofield:

I write on behalf of Steve Bajic, who is acting pro se in the above-captioned matter.

Based on the fact that the SEC filed an amended complaint yesterday, see Dkt. 220, it is our understanding that Mr. Bajic has 14 days from yesterday—December 8, 2020—to respond to the SEC's amended complaint. See Fed. R. Civ. P. 15(a)(3).

Based on Mr. Bajic's continuing discussions with the SEC, I respectfully request that the Court grant Mr. Bajic an additional 90 days from December 8, 2020: (1) to respond to the SEC's amended complaint and (2) to provide input on his participation in the Rule 26(f) conference and any pretrial conference materials. Mr. Bajic's response and input would be due on Monday, March 8, 2021. The SEC consents to these extensions.

Mr. Bajic has previously requested and received, with the SEC's consent, three prior extensions of these deadlines.

Respectfully submitted,

Robert J. Anello

Cc: Kathleen Shields